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IN THE SUPREME COURT

STATE OF NORTH DAKOTA

In the Matter of the Application for Disciplinary Action Against Robert V. Bolinske, Sr., a Member Of the Bar of the State of North Dakota Disciplinary Board of the Supreme Court of the State of North Dakota Petitioner, v. Robert V. Bolinske, Sr. Respondent.	RESPONDENT ROBERT V. BOLINSKE'S REPLY BRIEF Supreme Court No. 20190109 20190110 File Nos. 6176-W-1708 6177-W-1708

RESPONDENT'S REPLY BRIEF

ON REVIEW FROM THE FINDINGS OF FACT, CONCLUSIONS OF LAW AND RECOMMENDATION FOR DISCIPLINE

DISCIPLINARY BOARD FILE NOS. 6176-W-1708 AND 6177-W-1708

Dated June 17, 2019

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INTRODUCTION

1. Carter and Watson's case against Tesoro was the largest case I (Bolinske) have worked on in 50 years as a Trial Attorney. (T. 29-30) I have represented America's largest corporations and insurance companies, and also some of America's most destitute citizens. I have handled literally thousands and thousands of cases, mainly civil. I also handled approximately 15 criminal trials, losing only one. I have loved my work, and have thrown my mind, body and soul into it. (T.pp. 140-142) For my background and "resume", please see T. pp 86-87 and Exhibit M submitted with my Objections. To here be told by the Hearing Panel, when the only evidence clearly demonstrates that I earned some $400,000 to $600,000 in attorney fees, working night and day, week after week for approximately one and one-half years, that I didn't "earn" two $10,000 clearly identified "Non-Refundable" fees, and that I must refund $5,000 to each client, simply takes my breath away. Certainly that conclusion cannot withstand scrutiny in the real world as being fair and just. (T.pp. 13; 29; 25-26; 31-32; 65; 81-82) The reasons I charged each client a non-refundable $10,000 fee was to make certain (1) that my clients were being honest and sincere about their claims, (2) that they would have "some skin in the game" and (3) to ensure that I got at least something for my efforts. (T.pp. 13-17; 32-33; 68-69)

My Fee Agreement provided that the $10,000 non-refundable fees would be deducted from any contingent fee that might be recovered. (D.C. Exhibit 4-5, A. 52-53)

2. This case involved the largest oil spill ever on the continental United States. I dragged Tesoro, a major oil company, represented by some of the fanciest attorneys and largest firms in the United States, kicking and screaming, to and through Mediation. (T.pp. 76-79; 91) In my view, we were on Tesoro's five yard line, ready to "punch it in,"

when my clients, Carter and Watson, abruptly terminated me and, I suspect, got back in bed with Tesoro. (T.pp.15-17; 29-30) Tesoro, I submit, thereby avoided being proven to have raped and pillaged the landowner, and, indeed, much of Western North Dakota, by using defective oil field pipe, unqualified clean-up contractors and actually "faking" much of the clean-up. Carter and Watson, Tesoro's former employees, who were "blowing the whistle", by again teaming up with Tesoro, walked away, I surmise, with a $5,000,000 line of credit, a new business venture and lucrative contracts with Tesoro. (Exhibit A, attached to Objections; T.pp. 15-17; 29-30)

3. For a summary of our case against Tesoro, please see my March 4, 2017 letter to Tesoro setting forth Carter and Watson's claims. (Respondent Bolinske's Exhibit A, Submitted with my Objections.)

4. Me? For all my hard and dedicated work? I got grievances filed against me by two slimey people who I have in this process demonstrated to have no credibility, and who didn't dare show up by telephone or in person to testify against me at either the Inquiry Committee Hearing, such as it was, or the Hearing before the Hearing Panel. And, I lose two more years of my life fighting these grievances, all at tremendous work, expense, strife and emotional distress. Please pardon me for suggesting that there is something else, quite nefarious, going on here. I spell it all out in my Objections. If you are going to fairly judge me and my actions in this case, please take the time to read them.

5. Now, I will get the opportunity to sue Carter and Watson for my trouble. Please see my Notice of Wrongful Termination of Contingent Fee Services Agreement to Carter and Watson dated August 23, 2017, and submitted as Exhibit B attached to my

Objections for the basis for my claim.

ARGUMENT

I. The Only Evidence in this Case Demonstrates that Bolinske's "Non-refundable" Attorney Fees Were Earned Many Times Over.

6. The Hearing Panel made certain Findings, which Bolinske contends are erroneous. In some instances, the Panel neglected altogether to even make Findings on necessary elements to be established before an ethical violation can be found. Those will be discussed below.

7. It is well established that this Court reviews disciplinary proceedings de novo. Disciplinary Counsel must prove each alleged ethical violation, and each element of the claimed violation by "clear and convincing evidence." Disciplinary Bd. V. Allen, 2017 ND 199, ¶ 10, 900 N.W.2d 240

8. I must here confess to a serious error describing the "Issues Presented" in my original brief. The issue is not in each instance whether the Hearing Panel's Finding is "arbitrary, capricious or unreasonable."

9. Rather, the issue in each instance is whether the Hearing Panel's Finding has been proven by "clear and convincing" evidence. Here, I, Bolinske, was the only witness. That was, I suggest, because Carter and Watson were shown in my submissions to be so slimey and dishonest that they didn't dare appear at either (1) the Inquiry Committee Hearing or (2) the Disciplinary Board Hearing conducted by the Hearing Panel. They knew that they would be subjected to withering cross-examination and wanted no part of it.

10. Bolinske established by uncontroverted evidence that he spent some $400,000 to $600,000 in attorney fees over approximately one and a half years and that his file

weighed some 73 pounds. (T.pp. 25-26; 31-32; 13; 65; 29) Pursuant to Hoffman, only fees which are not earned must be refunded. Here, none-the- less, the Hearing Panel ordered Bolinske to return $5,000 in fees to Carter and $5,000 to Watson. That is patently absurd, arbitrary, capricious and unreasonable. Each client, both powerful business executives, paid an agreed upon $10,000 non-refundable fee, plus a contingent fee. They knew exactly what they were doing, and that "non-refundable" meant "non-refundable". It is not a difficult concept to grasp. The only way, under the Hoffman decision, Bolinske could legitimately be ordered to repay any of the $10,000 fee is if he didn't earn it. Here, it is clear that his earned attorney fees, (no matter what the final determined dollar amount of fees to which he is entitled,) exceeds $20,000, thus no refund is due because the two $10,000 fees were earned. It is just plain ridiculous for the Hearing Panel to have concluded, by "clear and convincing" evidence, that Bolinske's earned fees in this case did not exceed $20,000 or that they were "unreasonable."

11. Finally, please see comment 3 to Rule 1.16(e) to the effect that a "lawyer is not required to remit to the client funds that the lawyer reasonably believes represent fees owed. (Emphasis added.) Bolinske not only "reasonably believed" that he was owed those fees, he in fact WAS.

12. Making the Panel's decision even more ludicrous is the fact that the Panel's Chair-person, Schaar, wrongfully excluded from evidence much of Bolinske's file in the case, with, it appears, the goal of making it difficult for him to prove the value and amount of fees he actually earned. (T., beginning p. 99; 95; 96-104; 107-8; 114-124) Not satisfied yet, Ms. Schaar then took the extraordinary step of denying Bolinske the right to even make an appropriate Offer of Proof of certain of his actual file materials

offered as evidence to prove the value and amount of his earned fees. (T.pp. 124-137) This entire saga is more specifically described in Respondent Robert V. Bolinske's Post Hearing Brief dated December 19, 2018, submitted as Exhibit G, and hereby incorporated herein as if set forth in full.

13. Further, in Hoffman, it is clear that the amount of fees actually earned must be analyzed, determined and found as a Finding of Fact. Here, the Hearing Panel made no such analysis, determination or Finding of Fact. They just somehow, it appears, pulled the $5,000 amount to be returned to each client "out of thin air," so to speak.

14. Bolinske objects to the conclusory findings re his not knowing the difference between the various retainers. First, this is entirely irrelevant. It mattered not a whit because the $10,000 retainers were non-refundable by whatever name. Please see Exhibit K, pages 18-19, for the reasons for Bolinske's position, which pages are incorporated herein.

15. There is an obvious effort by Schaar to paint Bolinske in a bad light. That was apparent early in the case, when D.C. and Schaar tried to make it appear that Bolinske had lied about when a motion for an extension of time was placed in the mail. They went on and on about it. But, it was a false allegation. Please see the actual facts set forth in Exhibit G, at pages 16-17. This is one reason Bolinske early on questioned the impartiality of Schaar, and thereafter, for reasons elsewhere explained, requested that she recuse herself. Exhibit G, pages 12-17.

16. Bolinske offered in Exhibit form an entire packet of his actual notes from his file. Please see Exhibit L.

17. Please examine Bolinske's notes of his telephone calls with Carter and Watson. And,

Bolinske testified that these were only part of his phone calls. He was campaigning for a seat on the N.D. Supreme Court, driving around the state of N.D. Bolinske testified that Carter called him nearly daily, morning , noon and night. (T.pp. 73-74) Obviously he couldn't make notes while driving, which is when many of his phone calls to and from Carter occurred. (T.P. 89-91)

18. Bolinske firmly believes that someone here has an agenda, and that that is why the Panel sought to minimize his efforts. How could <u>any</u> fair person conclude, by clear and convincing evidence, on this record, that Bolinske's work on the case did not exceed $20,000 and order him to return $5,000 to each client? These referred documents not only "put the lie" to Carter's claims that Bolinske had "disappeared for 3 months" but also demonstrate the amount of work I did on the case. Please see Exhibit D, and L and T. pp. 39-41.

19. And, Ms. Schaar seems not to understand that one need not keep time records in a Contingent Fee case, so no accounting of his time or "work completed", as would appear in an hourly fee basis case, was required. Bolinske explained at the Hearing that one benefit of doing Contingent Fee work was the great pleasure of getting away from the time consuming tedium of keeping time records, as he had for so many years been required to do. (T.p.80) Again, Bolinske testified that he had spent some $400,000 to $600,000 in attorney fees, had he been charging by the hour, which obviously far exceeded the $10,000 non-refundable fee paid by each client, meaning of course that his fee was <u>entirely</u> earned and there was no reason to refund <u>any</u> of it, per <u>Hoffman</u> (T.pp 13-14; 23-26; 29-33) <u>There was no testimony to the contrary</u>. Thus, to be directed to return $5,000 to each client, with <u>no</u> analysis or rationale given by Ms. Schaar is, it is submitted, further

evidence of her bias and /or lack of understanding of how a Contingent Fee case works. It is also clear that D.C. Erickson similarly had no idea in that she admitted that she had to seek guidance from more experienced attorneys because she had never even handled a contingent fee case. Exhibit G, pp. 5-8.

20. Bolinske objects to the Finding and that his fee agreements and fees were "unreasonable." In support of his position he cites (1) all Exhibits herein referenced and (2) Reality itself. Surely we must need some legitimate, specific factual and analytical basis and explanation for such conclusions. Not merely conclusory statements to that effect. Where is any evidence supporting the findings of "knowingly" or "should have known" or "harm" to the clients? There simply is none. Certainly not "clear" and certainly not "convincing." Indeed, there is now not even a finding of the required element of "harm."

21. This was a MAJOR case, not some same-old, same-old as the decision and D.C. seem to imply. I suggest that the entire Panel plus D.C. and her staff have never handled a case of this magnitude and complexity and would not even dare to take on such a case. I worked very hard for nearly one and one-half years, and poured much energy, experience and determination into the case. For them to conclude that my $400,000 to $600,000 in attorney fees to which I was entitled, and earned, was actually only worth $10,000 (and that half of each $10,000 non-refundable fee must be returned) is just patently absurd!!! How on earth, given my education, experience and over 40 years as a trial attorney, creation and pursuit of creative causes of action against Tesoro, dragging Tesoro to and through Mediation, actually preparing for and handling the Mediation, and then getting to Tesoro's 5 yard line before being wrongfully terminated,

against one of the largest oil companies in the world, and against several large Texas law firms, one of which claimed to be THE largest in the world, involving serious and very complicated legal issues, is said to be worth only $10,000 is, I submit, proof in and of itself of the bias, incompetence and unfairness of the process, the Panel and the decision. It's not in the realm of reality, and makes a mockery of and demonstrates the unreasonable nature of this proceeding and decision. This entire process, and the handling of the grievances reeks of unfairness and retaliation. The decision is not the product of a fair, decent, honorable and just system. Please see Exhibit H, which is incorporated herein

22. If billed at his usual hourly rate of $250 per hour, there would have resulted an attorney fee owing to Bolinske of hundreds of thousands of dollars. (T.p.144)

23. The $20,000.00 total fee here involved was earned, by nearly a year and one-half of work, dedication and planning by an attorney with over 40 years of litigation experience devoted to the case. Bolinske incorporates as if set out in full his entire file which consists of hundreds of pages of work product and weighed some 73 pounds as evidence of the tremendous amount of time and effort spent on this case. (T.p.144)

24. Through the neglect of Disciplinary Counsel Kara J. Erickson, Bolinske's Second Supplemental Response, which contained one of Bolinske's primary defenses, and which was served on Erickson electronically by e-mail on March 2, 2018 was not even forwarded to members of the Inquiry Committee. The Committee was set to convene on this case on March 9, 2018 at 9:00 a.m. Out of an excess of caution, Bolinske contacted Erickson on March 8, 2018 to make certain she had forwarded his Second Supplemental Response to the Committee, only to find out that she had NOT

done so. Bolinske then re-sent his Second Supplemental Response to Erickson on the afternoon of March 8, 2018 and does not still know (1) if it was sent (2) if it was received by or even if it was considered by the Committee which met the very next morning, Friday, March 9, 2018 at 9:00 a.m.

25. Erickson's neglect is critical in that Bolinske's Second Supplemental Response contained one of Bolinske's primary defenses to the grievance, namely that his fee arrangement was authorized by N.D.C.C.§ 28-26-01, which provides in relevant part that

"....the amount of fees of attorneys in civil actions must be left to the agreement, express or implied, of the parties. (Emphasis added.)

26. It is clear that Erickson did not know of, find or discuss this important statute, because nowhere in her Investigative Reports on these two cases is this statute even discussed. (Her reports are both dated October 31, 2017.) Erickson presumably became aware of N.D.C.C.§ 28-26-01 on March 8, 2017 but was, by rule, prohibited from discussing the case with the Inquiry Committee in its deliberations, so it is by Bolinske unknown if the Committee even discussed this important legal defense, and NO MENTION or DISCUSSION of it is anywhere made in the decision. Nor, frankly, is there anywhere in this entire process a discussion or analyses of the basis for the decision of the Inquiry Committee – only blatant unsupported conclusions.

27. The Petition for Discipline is clearly a proceeding looking for an imaginary problem. Only if Bolinske's legal work did not exceed a value of $20,000 would the issue of the propriety of his fee arrangement even arise. Because the value of his work far exceeded a value of $20,000 there is here no issue whatsoever. It is actually, I suggest, moot.

II. Bolinske took the Required "Steps Reasonably Practicable to Protect the Client's Interests" Re Returning the Client's Files and There is Absolutely NO Evidence of Harm to the Clients in this Regard, or Even a Finding of Fact to that Effect.

28. Bolinske objects to the conclusion of the Hearing Panel that he did not properly

return Carter and Watson's files. First, the only evidence in the case establishes that Carter and Watson already had their entire files, and that to return to them something they already had would be a ridiculous redundancy. (T.pp. 80-82) Bolinske so testified, and there is no evidence to the contrary. Carter and Watson didn't dare to testify either before the Inquiry Committee or the Hearing Panel, lest their slimy nature and total lack of credibility be put on display in cross-examination. Bolinske believed that Carter had all the file documents in the case against Tesoro, and participated in and actually did some of the legal research. He considered himself to be "co-counsel" because he had one year of law school. Just where is the proof that Bolinske is wrong in this belief? There is none. (T.pp. 80-82) Certainly not clear and convincing evidence as is required. Where are the names and dates of the documents in the file which were allegedly not returned? Where are the findings in that regard? They simply don't exist. The Rule itself [1.16(e)] states that a lawyer need only "take steps reasonably practible, to protect the client's interests—such as surrendering papers and property." (Emphasis added.)

29. First, it is not reasonable to go to the redundancy of giving the client a duplicate set of documents he already has. Here, 73 pounds of them. That would be not only time consuming, very expensive, wasteful of time and money, but downright stupid. Second, the purpose of the rule is to "protect the client's interests." Just how, I ask, are a client's interests "protected" by having a duplicative set of documents? The answer is, of course, they are not. When there is no rhyme, reason or meaning to a requirement, when there is no purpose to compliance, may I suggest that to require compliance, or call it an ethical violation, is just further farce? Where is the evidence that Bolinske was not correct in believing that Carter and Watson had all the file

documents? And, even if he wasn't, just what in these circumstances was he "reasonably" supposed to do? It is suggested that it would be "crazy" to require 73 pounds of duplicative documents to the clients. (T.pp. 80-82) Again, they were believed to already have them. Bolinske had been directed in each of their respective grievance letters NOT to contact either of them. Carter told Bolinske that he broke legs for the mob in a prior life. As Bolinske testified at the Hearing, "I may be a fool, but I'm not that big a fool" to unnecessarily deal with Carter. (T.p.60) Thus he could not reasonably be expected to ask either what they claimed not to have. It was certainly not that Bolinske was trying to avoid the obligation, as demonstrated by the fact that he willingly delivered hisentire file to Disciplinary Counsel. And where, pray tell, is the evidence that Bolinske "knowingly" violated the Rule? There is NONE, because Bolinske didn't do so. If he was erroneous, that is certainly not "knowingly." The evidence of this claimed violation simply doesn't exist, by clear and convincing evidence, or otherwise. If I am wrong about my position that I made "reasonable efforts" to return the files, it is clear that (1) I had nothing to hide, and willingly turned over all 73 pounds of files to DC (2) did not act "knowingly" or with an intent to conceal and (3) my actions were at most an instance of negligence. In Ward v. Disciplinary Board, 1881 NW 2d 226, 2016 N.D. 113, the N.D. Supreme Court held that such negligence is not an ethical violation. Likewise, the same rule applies, I suggest, if my Fee Agreement was not perfectly and artfully drafted.

30. And, where is the evidence that the client's interests were not "protected", as is the very purpose of the Rule? Again, there simply is none, and there is no evidence of the required element of harm being caused to the clients. If Carter and/or Watson need or

desire any part of Bolinske's file for any reason, it was in its entirety, delivered to Disciplinary Counsel on October 15, 2018 by 5 p.m. If Carter and Watson truly wanted any part of the file, they could have obtained it without having to contact Bolinske, and they still could. No harm, no foul. And, no ethical violation. There is here no evidence of harm certainly not "clear and convincing evidence of a "knowing" violation of the Rule or that Bolinske acted "unreasonably. Again, we have only conclusions from the Hearing Panel and no showing or finding of specific documents proven to have been knowingly withheld. No client's interests have been proven to have been harmed. Justice demands no less. Blatant conclusions, totally lacking in specifics are simply not enough to "convict" Bolinske by "clear and convincing" evidence.

III. The Hearing Panel (and this Court) Lacked Jurisdiction Over Bolinske, and the Entire Proceeding Is Null, Void and of No Effect Because Hearing Panel Chairperson Schaar, and the Panel, Failed to Comply With North Dakota Constitutional and Statutory Requirements.

31. Ms. Schaar was the Chair of the Hearing Panel of the Disciplinary Board of the North Dakota Supreme Court. Section 4 of Article XI of the North Dakota Constitution specifically requires that "civil officers" as defined by the N.D.C.C.§ 44-01-05 must, before they enter the duties of their office, "take and subscribe" to the therein stated oath or affirmation.. The definition of "civil officer" includes any appointed "member of any state authority, board....". As the Chair of the Hearing Panel of the Disciplinary Board of the Supreme Court, Ms. Schaar was required to (1) take (2) sign and (3) appropriately file the Oath.

32. Ms. Schaar and the Hearing Panel failed and neglected to comply with these Constitutional and Statutory requirements, as is evident by her "excuses" set forth in Paragraphs 13, 14, 15 and 16 of her Order Denying Motion to Recuse dated March 22, 2019. (Petitioner's Appendix, pp. 32-33.)

33. Consequently, because Chairperson of the Hearing Panel of the Disciplinary Board of the N.D. Supreme Court did not take, sign in writing and properly file her required Oath of Office any and all decisions of Ms. Schaar, and this entire procedure, are totally and entirely null and void, and of no effect, since she was by law not even legally qualified to act in the capacity of Hearing Panel Chair. The failure of Ms. Schaar to take, sign and properly file her written oath creates a vacancy in the position and works a forfeiture of all rights thereto. It is like Ms. Schaar, in her position, never existed.

34. Please see: N.D.C.C. § 44-01-05.

§ 44-01-05. Oath of civil officers. Each civil officer in this state before entering upon the duties of that individual's office shall take and subscribe the oath prescribed in section 4 of article XI of the Constitution of North Dakota. The oath must be endorsed upon the back of, or attached to, the commission, appointment, or certificate of election. The term civil officer includes every elected official, any individual appointed by the governor, appointed member of any state authority, board, bureau, commission, and council; and the appointed head of any state agency and agency division, whether the individual serves with or without compensation. Except for an individual appointed to fill a vacancy existing in the legislative assembly the term does not include any individual receiving a legislative appointment. For purposes of this chapter and chapter 44-05 the term civil officer has the same meaning as public officer. (Emphasis added.)

35. And, see N.D.C.C. §44-05.01. Officers authorized to administer oaths.

The following officers are authorized to administer Oaths:

1) Each justice of the supreme court, each judge of the district court, the clerk of the supreme court, and the clerk's deputy.
2) The clerk of the district court, county auditor, recorder, and the deputy of each such officer within that officer's county.
3) Each county commissioner and public administrator within that officer's county.
4) Notary public anywhere in the state.
5) Each city auditor, municipal judge, and township clerk, within that officer's own city or township.
6) Each sheriff and the deputy sheriff within the sheriff's county in the cases Prescribed by law. (Emphasis added.)

36. And, see N.D.C.C. § 44-05-04: Place of filing oath of office.

1) If a state official or member of a state board, with the secretary of state.
2) If a county official or member of a county board, with the county auditor.
3) If a city official or member of a city board, with the city auditor.
4) If a member of a district or political subdivision that is larger than a county, with the secretary of state. (Emphasis added.)

37. By analogy, I call your attention to Garass v. Cass County et.al, 2016 ND 148, 833 NW 2d 436. There, as here, it is submitted that strict compliance with statutory requirements (and, here, also, Constitutional requirements) are mandatory. It is respectfully submitted that Ms. Schaar and the panel's failure to comply with the here discussed requirements caused the Hearing Panel to lack jurisdiction to even participate in this Case. They simply were not qualified to proceed. This issue was brought to their attention, and they could have cured it, but they chose not to do so.

38. No one without proper Constitutional or statutory authority can act in the name of the government and issue lawful and enforceable orders. You can, because you have in fact complied with the requirements and taken, signed and filed the required written oath. Even a Notary Public, to act lawfully, and for his/her actions to be proper, must do the same. Ms. Schaar and the Panel neglected to do so, and consequently their actions here, including their decision, are simply null and void.

39. Certainly it cannot be argued that three men and/or women "off the street" so to speak, who are not authorized, and who have not met the requirements here involved, can go about willy nilly conducting hearings and issuing decisions which have the force of law. Lack of jurisdiction may be raised at any time. Here, it was raised prior to the subject Hearing conducted by the Hearing panel, and it is now being raised again here.

IV. Combined Contingent Fee and Retainer Fee Agreements are So Common And Reasonable that there are "Apps" (Forms) for that!!!

40. I contend that there is absolutely nothing wrong, illegal or unethical about

combined retainer and contingent fee agreements. They are found in no less a well recognized "All American" publication than American Jurisprudence Legal Forms 2d. Please see Am. Jur. Legal Forms 2d, Vol. 3, beginning at p. 111. Seven copies of the Form Agreement combining a retainer with a contingent fee will be submitted as Exhibit 1.

CONCLUSION

For all the above stated reasons, Petitioner Bolinske respectfully requests that the Hearing Panels findings of ethical violations be reversed, and that the Complaints-Grievances be in all things dismissed. Consequently, all sanctions should also be eliminated. Simply put, evidence does not exist in the record to establish or prove the alleged violations, by clear and convincing evidence or otherwise. Disciplinary Counsel has simply not met her burden of proof on each required element of each alleged violation.

BEFORE THE DISCIPLINARY BOARD OF THE

SUPREME COURT OF THE STATE OF NORTH DAKOTA

In the Matter of the Application for Disciplinary Action Against Robert V. Bolinske, Sr., a Member of the Bar of the State of North Dakota	)	
Disciplinary Board of the Supreme Court of the State of North Dakota Petitioner,	)	**CERTIFICATE OF SERVICE**
v.	)	Supreme Court Nos. 20190109 and 20190110
Robert V. Bolinske, Sr. Respondent.	)	

I hereby certify that the following:

Petitioner Robert V. Bolinske's Reply Brief were hand-delivered to:

Ms. Kara J. Erickson
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on the 17th day of June, 2019.

Dated this 17th day of June, 2019.

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